SEALED

FILED
IN OPEN COURT
APR 12 2017
CLERK, U.S. DISTRICT COURT
NEWPORT NEWS, VA

IN THE UNITED STATES DISTRICT COURT FOR THE

EASTERN DISTRICT OF VIRGINIA

Newport News Division

UNITED STATES OF AMERICA	)	
	)	CRIMINAL NO. 4:16CR60
v.	)	
	)	
ROSCOE LEE SIMPSON, JR,	)	21 U.S.C. § 846
(Counts 1-2)	)	Conspiracy to Possess with Intent to
	)	Distribute Cocaine
WILLIAM WHITE	)	(Count 1)
(Counts 1, 3)	)	
	)	21 U.S.C. § 841
DAVID ALLEN RUSH	)	Possess with Intent to Distribute Cocaine
(Count 1)	)	(Count 2)
	)	
RICHARD HENRY TAYLOR	)	Interstate Transportation in Aid of
(Count 1)	)	Racketeering Enterprises
	)	(Count 3)
JOSE PARRA, JR	)	
(Count 1)	)	21 U.S.C. § 853
	)	Forfeiture Allegation

SUPERSEDING INDICTMENT

APRIL 2016 Term - At Newport News, Virginia

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about or between January 2016 and July 2016, in the Eastern District of Virginia and elsewhere, the defendants, ROSCOE LEE SIMPSON, JR, WILLIAM WHITE, DAVID ALLEN RUSH, RICHARD HENRY TAYLOR, and JOSE PARRA, JR did unlawfully, knowingly and intentionally combine, conspire, confederate and agree together with other persons known and unknown to the grand jury to commit the following offenses against the United States:

1. Distribute five kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841 (a) (1) and (b) (1) (A).

2. Possess with intent to distribute five kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841 (a) (1) and (b) (1) (A).

(All in violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(A)).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 21, 2016, in Chesapeake, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, ROSCOE LEE SIMPSON, JR, did unlawfully, knowingly and intentionally possess with intent to distribute and distribute five hundred (500) grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about or between July 2016 and August 2016, the defendant, WILLIAM WHITE, did knowingly and intentionally travel in interstate commerce from Maryland to the Eastern District of Virginia with intent to promote, carry on, and facilitate the carrying on of an unlawful activity, namely being a business enterprise involving the distribution and possession with intent to distribute cocaine, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841, and thereafter the defendant did perform and attempt to perform acts to promote, manage, establish, carry on and facilitate the promotion, management, establishment, and carrying on of said unlawful activity, namely collecting $40,000 in United States currency, to facilitate the carrying on of the narcotics activities.

(All in violation of Title 18, United States Code, Sections 1952(a)(3) and 2)

FORFEITURE ALLEGATION

THE GRAND JURY FURTHER CHARGES THAT:

A. The defendants, ROSCOE LEE SIMPSON, JR, WILLIAM WHITE, DAVID ALLEN RUSH, RICHARD HENRY TAYLOR, and JOSE PARRA, JR. if convicted of the violation alleged in Counts One, Two and Three of the indictment, shall forfeit to the United States:

1. Any and all property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as the result of such violation; and

2. Any of the defendant's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation.

3. If any property that is subject to forfeiture above, (a) cannot be located upon the exercise of due diligence, (b) has been transferred to, sold to, or deposited with a third person, (c) has been place beyond the jurisdiction of the Court, (d) has been substantially diminished in value, or (e) has been commingled with other property that cannot be subdivided without difficulty; it is the intent of the United States to seek forfeiture of any other property of the defendant, as subject to forfeiture under Title 21, United States Code, Section 853(p).

(In violation of Title 21, United States Code, Section 853.)

Sealed Pursuant to the
E-Government Act of 2002

UNITED STATES V. ROSCOE LEE SIMPSON, JR, 4:16CR60

A TRUE BILL:

REDACTED COPY

FOREPERSON

DANA J. BOENTE
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